

**McGovern Legal Services, LLC**  
**Marlena S. Diaz-Cobo, Esq.**  
**850 Carolier Lane**  
**North Brunswick, NJ 08902**  
**Phone (732) 246-1221**  
**Fax (732) 246-1872**  
**ATTORNEYS FOR LAKEWOOD/FOUR SEASONS CONDOMINIUM ASSOCIATION, INC.**

In re:

SUSAN MARIE PRZYBILSKI  
Debtor.

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY  
IN PROCEEDINGS UNDER CHAPTER 13  
OF THE BANKRUPTCY CODE

CASE NO.: 23-21976-CMG

**OBJECTION TO CONFIRMATION OF  
DEBTOR'S CHAPTER 13 PLAN**

Creditor, Lakewood/Four Seasons Condominium Association, Inc. (the "Association"), by and through its counsel, McGovern Legal Services, LLC, hereby submits this objection to Debtor's plan of reorganization under Chapter 13 of the Bankruptcy Code. The Association's objection includes, but is not limited to the following:

**I. THE PROPOSED PLAN DOES NOT INCLUDE PAYMENT OF THE  
ASSOCIATION'S ENTIRE SECURED CLAIM.**

Debtor's proposed Chapter 13 Plan fails to properly identify and treat the Association's entire \$6,106.36 secured claim. The Association's proof of claim was timely filed on January 11, 2024.

The Debtor's Chapter 13 plan does not propose to pay the Association its entire secured claim. Pursuant to 11 U.S.C. §1322(b)(2), the Chapter 13 Plan may "modify the rights of holders of secured claims, other than a claim secured only by a security interest in real property that is

the debtor's principal residence" (emphasis added). As a result, the Association objects to confirmation of Debtor's Plan since it does not provide for payment of the entire secured claim and the Lien is filed against the Debtor's principal residence.

Respectfully submitted,  
McGovern Legal Services, LLC

Date: January 29, 2024

By: /s/Marlena S. Diaz-Cobo  
MARLENA S. DIAZ-COBO, ESQ.

**CERTIFICATION OF SERVICE**

I, Marlena S. Diaz-Cobo, Esq., certify and state that this document was served upon the individuals and/or entities listed below by electronic mail on January 29, 2024. I am aware that if any of the statements made herein are willfully false, I am subject to punishment.

Respectfully submitted,  
McGovern Legal Services, LLC

Date: January 29, 2024

By: /s/Marlena S. Diaz-Cobo  
MARLENA S. DIAZ-COBO, ESQ.

**SERVICE LIST**

**Via Electronic Service:**

CLERK, UNITED STATES BANKRUPTCY COURT  
402 East State Street  
Trenton, NJ 08608  
Telephone: 609-989-2200

SUSAN MARIE PRZYBILSKI  
c/o George E. Veitengruber, III  
1720 Highway 34, Suite 10  
Wall, NJ 07727

TRUSTEE  
Albert Russo  
Standing Chapter 13 Trustee  
CN 4853  
Trenton, NJ 08650-4853

U.S. TRUSTEE  
US Dept of Justice  
Office of the US Trustee  
One Newark Center Ste 2100  
Newark, NJ 07102